

REMARKS

Claim Changes

Claims 1, 8, and 14 are amended to more clearly recite the claimed invention. These changes are based at least on FIG. 3 and FIG. 4 and the accompanying description in paragraphs [0021] – [0025] of the specification as filed. Thus, no new matter is added.

No amendment made is related to the statutory requirements of patentability unless expressly stated herein. No amendment is made for the purpose of narrowing the scope of any claim, unless Applicant had argued herein that such amendment is made to distinguish over a particular reference or combination of references. Any remarks made herein with respect to a given claim or amendment is intended only in the context of that specific claim or amendment, and should not be applied to other claims, amendments, or aspects of Applicant's invention.

Rejection of Claims 1-2, 4-11, and 13 under 35 U.S.C. § 103(a) as being unpatentable over US 2003/0028763 (Malinen) and US 5,668,875 (Brown) in view of US 2003/0233546 (Blom)

Applicant respectfully traverses in part and amends in part. Applicant has amended the claims to clarify the invention. Applicant therefore respectfully requests reconsideration of the rejection of claims 1-2, 4-11, and 13 under 35 U.S.C. § 103(a) as being unpatentable over Malinen and Brown in view of Blom.

Malinen is directed towards a method for three-party authentication and authorization. Malinen authorizer generates a challenge using the identity sends it to the client. In return, the client generates a response and sends back to the authorizer. The authorizer compares the challenge to the response to authenticate the client. See Malinen paragraph [0011]. Brown is directed towards a method for authenticating a roaming subscriber. In Brown, a subscriber receives a challenge and converts the challenge with the subscriber's secret key and authentication algorithm into an authentication response. Brown's subscriber further converts the

authentication response in a form compatible with the local authentication protocol, and transmits to a local system communication unit. The challenge and response is then forwarded to the subscriber's home system for similar conversion and processing, and subscriber's response is compared against a home system generated response. See Brown col. 10 line 64 to col. 11, line 14. Blom is directed towards a challenge-response authentication procedure that includes masking of the expected response generated by an authentication center. The intermediate party also receives a user response from the user and generates a masked user response as the authentication center. In order to authenticate the user, the intermediate party then verifies that the masked user response corresponds to the masked expected response received from the authentication center. See Blom Abstract.

In contrast, Applicant independent claims 1 and 8 recites "obtaining one of the challenge response pairs associated with the electronic device subsequent to issuing the plurality of random challenges to the electronic device and receiving the plurality of responses from the electronic device," as amended. As explained above, Malinen, Brown, or Blom does not show or suggest obtaining a challenge response pair subsequent to issuing a random challenge and receiving the response.

For the above reasons, Applicant submits that independent claims 1 and 8 are not obvious in view of the combination of Malinen, Brown, or Blom, and therefore the rejection of claims 1 and 8 under 35 USC 103(a) should be withdrawn. Applicant requests that claims 1 and 8 now be passed to allowance.

Dependent claims 2, 4-7, 9-11, and 11 depend from, and include all the limitations of independent claims 1 and 8. Therefore, Applicant respectfully requests the reconsideration of dependent claims 2, 4-7, 9-11, and 11 and requests withdrawal of the rejection.

Rejection of Claims 14-17 under 35 U.S.C. § 103(a) as being unpatentable over US 2003/0028763 (Malinen) and US 5,668,875 (Brown) in view of WO 00/02406 (Ekberg) and further in view of US 2003/0233546 (Blom)

Applicant respectfully traverses in part and amends in part. Applicant has amended the claims to clarify the invention. Applicant therefore respectfully requests reconsideration of the rejection of claims 14-17 under 35 U.S.C. § 103(a) as being unpatentable over Malinen and Brown in view of Ekberg and Blom.

Malinen, Brown, and Blom have been previously discussed and it has been reiterated that they do not show or suggest obtaining a challenge response pair subsequent to issuing a random challenge and receiving the response. Ekberg is directed towards a method for authentication to be performed in an IP network. In Ekberg, the subscriber's authentication information containing a challenge and a response is fetched from the said mobile communications system to the IP network and authentication is carried out based on the authentication information obtained from the mobile communications system. See Ekberg Abstract. Ekberg also does not show or suggest "obtaining from an electronic device a plurality of challenge response pairs subsequent to issuance of a plurality of random challenges to the electronic device and receiving a plurality of responses from the electronic device" as recited by independent claim 14.

For the above reasons, Applicant submits that independent claim 14 is not obvious in view of the combination of Malinen, Brown, Ekberg or Blom, and therefore the rejection of claim 14 under 35 USC 103(a) should be withdrawn. Applicant requests that claim 14 now be passed to allowance.

Dependent claims 15-17 depend from, and include all the limitations of independent claim 14. Therefore, Applicant respectfully requests the reconsideration of dependent claims 15-17 and requests withdrawal of the rejection.

Rejection of Claims 1-2, 4-11, and 13 under 35 U.S.C. § 103(a) as being unpatentable over US 2003/0028763 (Malinen) and US 2005/0113067 (Marcovici) in view of US 2003/0233546 (Blom)

Applicant respectfully traverses in part and amends in part. Applicant has amended the claims to clarify the invention. Applicant therefore respectfully requests reconsideration of the rejection of claims 1-2, 4-11, and 13 under 35 U.S.C. § 103(a) as being unpatentable over Malinen and Marcovici in view of Blom.

Malinen and Blom have been previously discussed and it has been reiterated that they do not show or suggest obtaining a challenge response pair subsequent to issuing a random challenge and receiving the response. Marcovici is directed towards a method for determining a private key for a first network based on a security value associated with a second network. Marcovici further mentions establishing a plurality of sessions including sending challenges and receiving responses between a mobile terminal and the first network based on the private key. See Marcovici Abstract and paragraph [0036]. Marcovici also does not show or suggest “obtaining one of the challenge response pairs associated with the electronic device subsequent to issuing the plurality of random challenges to the electronic device and receiving the plurality of responses from the electronic device” recited by independent claims 1 and 8, as amended.

For the above reasons, Applicant submits that independent claims 1 and 8 are not obvious in view of the combination of Malinen, Marcovici, or Blom, and therefore the rejection of claims 1 and 8 under 35 USC 103(a) should be withdrawn. Applicant requests that claims 1 and 8 now be passed to allowance.

Dependent claims 2, 4-7, 9-11, and 11 depend from, and include all the limitations of independent claims 1 and 8. Therefore, Applicant respectfully requests the reconsideration of dependent claims 2, 4-7, 9-11, and 11 and requests withdrawal of the rejection.

Rejection of Claims 14-17 under 35 U.S.C. § 103(a) as being unpatentable over US 2003/0028763 (Malinen) and US 2005/0113067 (Marcovici) in view of WO 00/02406 (Ekberg) and further in view of US 2003/0233546 (Blom)

Applicant respectfully traverses in part and amends in part. Applicant has amended the claims to clarify the invention. Applicant therefore respectfully requests reconsideration of the rejection of claims 14-17 under 35 U.S.C. § 103(a) as being unpatentable over Malinen and Marcovici in view of Ekberg and Blom.

Malinen, Marcovici, Ekberg, and Blom have been previously discussed and it has been reiterated that they do not show or suggest “obtaining from an electronic device a plurality of challenge response pairs subsequent to issuance of a plurality of random challenges to the electronic device and receiving a plurality of responses from the electronic device” as recited by independent claim 14.

For the above reasons, Applicant submits that independent claim 14 is not obvious in view of the combination of Malinen, Marcovici, Ekberg or Blom, and therefore the rejection of claim 14 under 35 USC 103(a) should be withdrawn. Applicant requests that claim 14 now be passed to allowance.

Dependent claims 15-17 depend from, and include all the limitations of independent claim 14. Therefore, Applicant respectfully requests the reconsideration of dependent claims 15-17 and requests withdrawal of the rejection.

Conclusion

Applicant respectfully requests that a timely Notice of Allowance be issued in this case. Such action is earnestly solicited by the Applicant. Should the Examiner have any questions, comments, or suggestions, the Examiner is invited to contact the Applicant’s attorney or agent at the telephone number indicated below.

Please charge any fees that may be due to Deposit Account 502117, Motorola, Inc.

Respectfully submitted,

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